

### REMARKS

This Application has been carefully reviewed in light of the Final Office Action mailed November 1, 2005 (the "Office Action"). Claims 1-5, 9, 10, 14-18, 22, 23 and 27-31 are pending in the application. The Examiner rejects Claims 1-5, 9, 10, 14-18, 22, 23 and 27-31. To advance prosecution of this case, Applicant amends Claims 1, 9, 14, 22, and 27-30. Applicant does not admit that any amendments are due to any prior art or any of the Examiner's rejections. Applicant respectfully requests reconsideration and allowance of all pending claims.

### Claim Objections

The Examiner objects to the phrase "identifying one or more duplicate results" in Claim 29 as being unclear. Claim 29 has been amended to remove the phrase "identifying one or more duplicate results." In addition, in amended Claims 1, 9, 14, and 22, the phrase "duplicate result" is clear in light of the structure and syntax of these claims. Accordingly, Applicant respectfully requests reconsideration and allowance of amended Claim 29.

### Section 103 Rejections

The Examiner rejects Claims 1-5, 9-10, 14-18, 22-23 and 27-31 under 35 U.S.C. §103(a) as being unpatentable over U.S. Patent No. 6,356,892 issued to Corn, et al. ("*Corn*"), in view of U.S. Patent No. 6,112,198 issued to Lohman, et al. ("*Lohman*"), and in view of U.S. Patent No. 5,412,804 issued to Krishna, ("*Krishna*"). Applicant respectfully traverses this rejection and requests reconsideration and allowance of Claims 1-5, 9-10, 14-18, 22-23 and 27-31.

The cited references fail to support the rejection for at least two reasons. First, the *Corn-Lohman* combination is improper because the proposed combination would render *Corn* unsatisfactory for its intended purpose. Second, the cited references fail to teach, suggest, or disclose "deleting or disregarding at least one duplicate result associated with the sum of terms" as recited, in part, in amended Claim 1.

At the outset, the *Corn-Lohman* combination is improper because the proposed combination would render *Corn* unsatisfactory for its intended purpose. Applicant asserted this argument in Applicant's response to the May 17, 2005 Office Action. The Examiner, however, failed to consider this argument in the November 1, 2005 Office Action. Instead,

the Examiner stated that the argument was “moot in view of the new ground of rejection.” (Office Action, p. 11). Applicant, however, respectfully submits that the addition of *Krishna* does not overcome the fact that the teachings of *Lohman* would render *Corn* unsatisfactory for its intended purpose. As stated in the response to the May 17, 2005 Office Action, if a “proposed modification would render the prior invention being modified unsatisfactory for its intended purpose, then there is no suggestion or motivation to make the proposed modification.” MPEP § 2143.01.

A “primary object” of *Corn* is to search a relational database to retrieve “target entries that exactly match given search criteria.” (*Corn*; col. 2, ll. 32-38). *Corn* describes a method for mapping an LDAP search query into an SQL query. (*Corn*; col. 2, ll. 51-54). To formulate the SQL query, the method in *Corn* must generate “unique entry identifier (EID) sets.” (*Corn*; col. 3, ll. 1-20). “Each LDAP entry is assigned a unique identifier (EID)” and the EIDs are stored in an “Entry Table” and an “Attribute Table.” (*Corn*; col. 5, ll. 59-65; col. 6, ll. 16-22). The “Entry Table” stores each EID with entry data, and the “Attribute Table” stores each EID with attribute values. (*Corn*; col. 5, ll. 58-67; col. 6, ll. 16-22). *Corn* formulates SQL queries by incorporating terms associated with EIDs. In particular, *Corn* requires that the EID sets be “merged together, preferably into a single SQL query.” (*Corn*; col. 7, ll. 42-44). For example, *Corn* presents the following SQL query:

```
SELECT entry.EntryData, FROM LDAP_ENTRY as entry WHERE
entry.EID in (SELECT distinct LDAP_ENTRY.EID FROM
LDAP_ENTRY.ldap_desc WHERE (LDAP_ENTRY.EID=ldap_desc.DEID
AND ldap_desc.AEID=<id>) AND LDAP_ENTRY.EID NOT IN ((SELECT
EID FROM fl where fl=' v1'))).
```

(*Corn*; col. 11, ll. 10-20) (emphases added). Notably, this SQL query comprises numerous terms associated with EIDs. Therefore, to retrieve data using this query, *Corn* must search the EIDs associated with LDAP entries.

In contrast to *Corn*, the method in *Lohman* does not generate or store EIDs for each LDAP entry. Rather, *Lohman* describes a method for separating a query into “subtasks” and dividing a database into multiple “partitions.” (*Lohman*; col. 2, ll. 53-60). *Lohman* then applies each subtask to an individual partition of the database. (*Lohman*; col. 2, ll. 53-60). Combining *Corn* with *Lohman* would result in applying queries associated with EIDs to a database without EIDs. A query or subquery for particular EIDs, as described in *Corn*, will simply not return results from a database that does not comprise any EIDs, as described in

*Lohman*. Thus, the proposed combination would render *Corn* inoperable and therefore unsatisfactory for its intended purpose of retrieving “target entries that exactly match given search criteria.” (*Corn*; col. 2., ll. 32-38). Because the proposed combination would render *Corn* unsatisfactory for its intended purpose, the combination is improper. As a result, Applicant respectfully requests that the Examiner withdraw the *Corn-Lohman* combination.

Even if the improper combination is not withdrawn, the cited references fail to teach, suggest, or disclose “deleting or disregarding at least one duplicate result associated with the sum of terms” as recited, in part, in amended Claim 1. The cited references describe various methods for processing database queries. In particular, *Corn* describes a method for translating an LDAP filter-based query to an SQL subquery. (*Corn*; abstract; col. 3, ll. 1-41). *Lohman* describes a method for parallel processing of subtasks associated with a query. (*Lohman*; abstract; col. 1, ll. 42-59). Finally, *Krishna* describes a method for un-nesting nested query blocks. (*Krishna*; abstract; col. 3, ll. 19-41). Notably, none of these references teach, suggest, or disclose “at least one duplicate result associated with the sum of terms” as recited, in part, in amended Claim 1. Furthermore, the cited references fail to teach, suggest, or disclose “deleting or disregarding at least one duplicate result” as recited, in part, in amended Claim 1. Because the cited references fail to teach, suggest, or disclose these aspects of amended Claim 1, the cited references fail to support the rejection. For the foregoing reasons, Applicant respectfully requests reconsideration and allowance of amended Claim 1.

In rejecting Claims 9, 14, and 22, the Examiner employs the same rationale used with respect to Claim 1. Accordingly, for at least the reasons stated with respect to amended Claim 1, Applicant respectfully requests reconsideration and allowance of amended Claims 9, 14, and 22.

Claims 2-5, 10, 15-18, 23, 31 and amended Claims 27-30 depend from independent claims shown above to be allowable. In addition, these claims recite further elements not taught, suggested, or disclosed by the cited references. For example, the cited references fail to teach, suggest, or disclose “expanding each term to remove NOT operators” as recited, in part, in Claim 2. As stated in the response to the May 17, 2005 Office Action, *Corn* does not teach the removal of NOT operators. Instead, *Corn* teaches the translation of an LDAP logical operator NOT to an SQL logical operator NOT IN. (*Corn*; col. 8, ll. 40-51). Notably, the SQL logical operator NOT IN comprises the logical operator NOT. In the November 1,

2005 Office Action, the Examiner maintained the rejection of Claim 2 but failed to explain how the conversion of NOT to NOT IN, as described in *Corn*, teaches, suggests, or discloses “expanding each term to remove NOT operators” as recited, in part, in Claim 2. Because the cited references fail to teach, suggest, or disclose “expanding each term to remove NOT operators” as recited, in part, in Claim 2, the cited references fail to support the rejection. For at least these reasons, Applicant respectfully requests reconsideration and allowance of Claims 2-5, 10, 15-18, 23, 31 and amended Claims 27-30.

**CONCLUSION**


Applicant has made an earnest attempt to place this case in condition for allowance. For the foregoing reasons and for other reasons clearly apparent, Applicant respectfully requests reconsideration and full allowance of all pending claims.

If there are matters that can be discussed by telephone to further the prosecution of this Application, Applicant invites the Examiner to call the undersigned attorney at (214) 953-6581 at the Examiner's convenience.

Applicant believes that no fees are due; however, the Commissioner is hereby authorized to charge any fees or credit any overpayment to Deposit Account No. 02-0384 of Baker Botts L.L.P.

Respectfully submitted,

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